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Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Dennis Lloyd Hallman, Brandon Vera, Pablo Garza,  
Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and  
Darren Uyenoyama*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, and Jon Fitch, on behalf  
of themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

Case Nos. 5:14-cv-05484-EJD;  
5:14-cv-05591-EJD;  
5:14-cv-05621-EJD;  
5:15-cv-00521-EJD;  
5:15-cv-01324-EJD

**DECLARATION OF PLAINTIFF CUNG  
LE IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANT'S  
MOTION TO TRANSFER VENUE**

**Luis Javier Vazquez and Dennis Lloyd Hallman,  
on behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Brandon Vera and Pablo Garza, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Gabe Ruediger and Mac Danzig, on behalf of  
themselves and all others similarly situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Kyle Kingsbury and Darren Uyenoyama, on  
behalf of themselves and all others similarly  
situated,**

**Plaintiffs,**

**v.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

5:14-cv-05484-EJD, 5:14-cv-05591-EJD  
5:14-cv-05621-EJD, 5:15-cv-00521-EJD  
5:15-cv-01324-EJD

1 I, Cung Le, declare that I am more than 18 years of age and I am competent to testify about  
2 the subjects declared herein, and that under the penalty of perjury, the following declarations are true  
3 and correct and based on my personal knowledge:

- 4 1. I am an Elite Professional MMA Fighter and proposed representative of the Bout and  
5 Identity Classes in the above-captioned matter. Along with Co-Plaintiffs Nathan  
6 Quarry and Jon Fitch, I filed the complaint in the above-captioned matter on  
7 December 16, 2014.
- 8 2. I currently reside in San Jose, California. Along with residing and fighting in San  
9 Jose, California, I consistently trained for MMA bouts in San Jose.
- 10 3. Throughout my career, I have won ten (10) championship martial arts titles including  
11 the Strikeforce Middleweight World Title and am a three (3) time Bronze Medalist in  
12 the Wushu World Championships.
- 13 4. I fought nine (9) of my twelve (12) professional MMA bouts in San Jose, including  
14 "UFC 139" on November 19, 2011, at the HP Pavilion (now the "SAP Center"). I was  
15 subject to a UFC bout agreement for my performance in "UFC 139."
- 16 5. Prior to joining the UFC, I was a fighter for the UFC's former rival, San Jose-based  
17 Strikeforce. Of the eight (8) Strikeforce-promoted MMA bouts I competed in between  
18 March 10, 2006 and June 26, 2010, all eight (8) took place at the HP Pavilion in San  
19 Jose, California.
- 20 6. In 2011, following the UFC's purchase of Strikeforce, I signed contractual  
21 agreements with the UFC.
- 22 7. I appeared in *EA Sports UFC*, the fourth installment of the UFC video game  
23 franchise, initially released on June 17, 2014. *EA Sports UFC* is an MMA fighting  
24 video game developed by Electronic Arts, which is based in the Northern District of  
25 California.
- 26 8. I also appeared in Round 5 action figure sets, including limited edition sets, and  
27 Topps Trading Card sets.

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12. I chose to file the above-captioned matter in this District because it was by far the most convenient forum to pursue my antitrust claim. I reside with my family and continue to train in this District, making it the ideal forum for me to litigate this action. It would produce considerable hardship to be called to testify in an alternative, out-of-state forum.

By: Cung Le  
Cung Le